

FILED

JAN 23 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

)

v.

) CASE NO.

EDWARD G. ROBINSON,
ZELDA M. LAMAR,

) Title 18, United States Code,
Section 371; Title 26, United
States Code, Section 7206(2)

Defendants.

JUDGE POLSTER

GENERAL ALLEGATIONS

At all times material to this Indictment unless otherwise specified:

1. Defendant EDWARD G. ROBINSON was a resident of Cleveland, Ohio.
2. Defendant ZELDA M. LAMAR was a resident of Cleveland, Ohio, and was married to ROBINSON.
3. From no later than in or around January 2017 through at least in or around June 2022, Continental E-File Service (“Continental”) was a tax preparation business that operated in Cleveland, Ohio, in the Northern District of Ohio, Eastern Division.
4. ROBINSON owned and operated Continental and LAMAR worked as a tax preparer at Continental.
5. A “tax preparer” was an individual who completes and files, and causes to be filed, federal income tax returns on behalf of a taxpayer.
6. An Electronic Filing Identification Number (“EFIN”) was a unique, non-transferable identification number assigned by the Internal Revenue Service (“IRS”) to a firm

that had completed an IRS e-file application to become an authorized IRS e-file provider and had passed a suitability check, in order to provide electronic tax return filing services to clients.

7. A Preparer Tax Identification Number (“PTIN”) was a number assigned by the IRS to tax return preparers who were compensated for preparing tax returns. To obtain a PTIN, an individual was required to submit an application to the IRS.

8. IRS Form Schedule C was a form used to report profit or loss from any sole proprietorship that an individual operated. Profit or loss reflected on a Form Schedule C was also reflected on the Form 1040.

9. The Earned Income Tax Credit (“EITC”) and Additional Child Tax Credit were refundable tax credits for low-income, working individuals and families with children. The EITC was calculated as a percentage of an earned income level. The EITC operated in the shape of a bell curve, allowing additional credit as a taxpayer’s earnings increased until reaching the apex of the curve, at which point the EITC began to decrease, ultimately phasing out completely for taxpayers who exceeded a certain income level.

COUNT 1
(Conspiracy to Defraud the United States, 18 U.S.C. § 371)

The Grand Jury charges:

10. The factual allegations contained in Paragraphs 1 through 9 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

11. From in or around April 2016, and continuing to in or around November 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants EDWARD G. ROBINSON and ZELDA M. LAMAR, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other to defraud the United States by impeding, impairing, obstructing, and defeating the lawful Government

functions of the Internal Revenue Service of the Department of the Treasury in the ascertainment, computation, assessment, and collection of the revenue, to wit, income taxes.

Objects of the Conspiracy

12. The objects of the conspiracy included, but were not limited to, the following: for Defendants and others to unlawfully enrich themselves by, among other things, obtaining the proceeds of fraudulent income tax refunds generated by false income tax returns prepared and submitted to the IRS, and diverting fraud proceeds for Defendants' use and the use and benefit of others and to conceal the offense.

Manner and Means of the Conspiracy

13. The manner and means by which Defendants and their co-conspirators carried out the scheme included, but were not limited to, the following:

- a. ROBINSON, LAMAR, and others worked as tax preparers with Continental.
- b. ROBINSON and LAMAR aided and assisted in the preparation and filing of U.S. individual Income Tax Returns for two types of clients, those for whom they filed false and fraudulent forms Schedule C ("Schedule C Clients") and those for whom they created false and fraudulent Forms 1099 ("1099 Clients").
- c. ROBINSON, LAMAR, and others would obtain income information and personal identifying information of clients needed for the preparation of income tax returns, including clients' names, addresses, and taxpayer identification numbers.
- d. For Schedule C Clients, ROBINSON, LAMAR, and others would prepare and cause to be prepared false Schedule C forms claiming the Schedule C Clients had businesses with fictional or falsely inflated business losses, including from fabricated business expenses

such as contractor labor expenses, when in truth and fact, those Schedule C Clients did not have businesses or otherwise had not recorded the expenses and losses reported.

e. ROBINSON, LAMAR, and others used the fraudulent business losses to reduce Schedule C Clients' taxable income and thus increase their refundable credits, including from the EITC and Additional Child Tax Credits, resulting in the preparation and submission of income tax returns claiming refunds to which those Schedule C Clients were not entitled.

f. ROBINSON, LAMAR, and others would generate and cause to be generated, and file and cause to be filed, false and fraudulent IRS Forms 1099-MISC and 1099-NEC that purported to be issued by the Schedule C Clients claiming that they had paid certain 1099 Clients for services.

g. ROBINSON, LAMAR, and others aided and assisted in the filing of false U.S. individual Income Tax Returns (IRS Forms 1040 and 1040SR) for Schedule C Clients, which contained false and fraudulent items. The false and fraudulent items included, but were not limited to, the Forms 1099-MISC and 1099-NEC purportedly issued to the 1099 Clients that falsely claimed them as contract labor for the Schedule C, as well as other falsified Schedule C business income and losses, including from expenses such as advertising, car and truck, utilities, and supplies. The false returns sought refundable credits, including the Additional Child Tax Credit and EITC, based on the misrepresentations.

h. ROBINSON, LAMAR, and others aided and assisted in the filing of false U.S. individual Income Tax Returns (IRS Forms 1040 and 1040SR), for 1099 Clients, which contained false and fraudulent items. The false and fraudulent items included, but were not limited to: claiming the income from the Forms 1099 purportedly issued by Schedule C Clients

to 1099 Clients, which falsely increased the 1099 Clients' income, and thus qualified them for, and falsely inflated the size of, refundable tax credits, such as the EITC.

i. ROBINSON, LAMAR, and others made false representations and claims on clients' tax returns without receiving proper documentation or authorization from their clients.

j. ROBINSON, LAMAR, and others charged clients fees for preparing their false income tax returns.

k. ROBINSON, LAMAR, and others sought to conceal the existence of the conspiracy and evade detection by falsifying documents and providing false information to the IRS.

Overt Acts

14. In furtherance of the conspiracy, and to accomplish its objects, at least one of the co-conspirators committed and caused to be committed, in the Northern District of Ohio, and elsewhere, at least one of the following overt acts, among others:

15. On or about April 19, 2016, ROBINSON applied for and obtained a PTIN ending in 4681.

16. On or about December 20, 2016, LAMAR applied for and obtained an PTIN ending in 4691.

17. On or about January 30, 2017, ROBINSON applied for and obtained an EFIN ending in 0511, for Continental.

18. On or about February 11, 2022, ROBINSON provided false and fraudulent documents to the IRS in response to an IRS summons.

19. ROBINSON and LAMAR committed the acts alleged in Counts 2 through 19 of this Indictment, each of which is incorporated by reference herein as an overt act in furtherance of the conspiracy.

20. ROBINSON committed the acts alleged in Counts 20 through 40 of this Indictment, each of which is incorporated by reference herein as an overt act in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2 – 19

(Aiding and Assisting the Filing of False Tax Returns, 26 U.S.C. § 7206(2))

The Grand Jury further charges:

21. The factual allegation of Paragraphs 1 – 9 and 11 – 18 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

22. On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants EDWARD G. ROBINSON and ZELDA M. LAMAR did willfully aid and assist in, and procure, counsel, and advise in, the preparation and presentation to the Internal Revenue Service of a false Individual Income Tax Return, Form 1040 (including a Form 1040SR) with a false Schedule C, for the calendar years set forth below, which were false and fraudulent as to a material matter, to wit: the total taxable income reported on the Form 1040 and the following false items, each filing of a return constituting a separate count of this Indictment. The tax returns reported various contract labor, vehicle, advertising, utilities, and other business expenses, whereas, as ROBINSON and LAMAR knew, the taxpayers either did not incur these expenses or incurred the expenses in an amount far less than what was reported on the return, and each sought a refund to which the taxpayer was not entitled:

Count	Approx. Filing Date	Client	Tax Year	False Item(s)	Amount Reported
2	2/3/2020	J.B.	2019	Schedule C, Line 9, Car and Truck	\$5,469.00
				Schedule C, Line 11, Contract Labor	\$9,213.00
				Schedule C, Line 22, Supplies	\$956.00
				Schedule C, Line 25, Utilities	\$1,265.00
				Schedule C, Line 27, Other	\$568.00
3	2/27/2019	E.D.	2018	Schedule C, Line 11, Contract Labor	\$19,789.00
4	2/20/2020	E.A.	2019	Schedule C, Line 8, Advertising	\$3,300.00
				Schedule C, Line 9, Car and Truck	\$5,406.00
				Schedule C, Line 11, Contract Labor	\$10,795.00
				Schedule C, Line 22, Supplies	\$3,200.00
				Schedule C, Line 25, Utilities	\$1,585.00
5	3/8/2021	E.A.	2020	Schedule C, Line 9, Car and Truck	\$5,504.00
				Schedule C, Line 11, Contract Labor	\$11,405.00
				Schedule C, Line 22, Supplies	\$1,200.00
				Schedule C, Line 25, Utilities	\$1,540.00
6	3/6/2019	J.H and L.L.	2018	Schedule C, Line 11, Contract Labor	\$22,862.00
7	3/24/2020	J.H and L.L.	2019	Schedule C, Line 8, Advertising	\$ 500.00
				Schedule C, Line 9, Car and Truck	\$ 5,406.00
				Schedule C, Line 11, Contract Labor	\$ 6,385.00
				Schedule C, Line 25, Utilities	\$ 2,295.00
8	1/27/2020	R.J. and B.P.	2019	Schedule C, Line 1, Gross Receipts	\$ 1,526.00
				Schedule C, Line 9, Car and Truck	\$ 5,469.00
				Schedule C, Line 11, Contract Labor	\$ 22,258.00
9	1/29/2020	M.Ga.	2019	Schedule C, Line 9, Car and Truck	\$ 4,967.00
				Schedule C, Line 11, Contract Labor	\$ 30,542.00
				Schedule C, Line 25, Utilities	\$ 1,595.00
10	2/15/2019	M.Go.	2018	Schedule C, Line 1, Gross Receipts	\$ 4,312.00
				Schedule C, Line 9, Car and Truck	\$ 4,109.00
				Schedule C, Line 11, Contract Labor	\$ 33,597.00
11	2/9/2020	R.H.	2019	Schedule C, Line 9, Car and Truck	\$ 4,665.00
				Schedule C, Line 11, Contract Labor	\$ 13,655.00
				Schedule C, Line 25, Utilities	\$ 1,320.00
12	4/1/2021	R.H.	2020	Schedule C, Line 9, Car and Truck	\$ 5,333.00
				Schedule C, Line 11, Contract Labor	\$ 10,837.00
				Schedule C, Line 25, Utilities	\$ 1,320.00
13	2/2/2019	G.O.	2018	Schedule C, Line 1, Gross Receipts	\$ 2,500.00
				Schedule C, Line 9, Car and Truck	\$ 2,819.00
				Schedule C, Line 11, Contract Labor	\$ 27,466.00
				Schedule C, Line 25, Utilities	\$ 1,325.00

Count	Approx. Filing Date	Client	Tax Year	False Item(s)	Amount Reported
14	1/27/2020	G.O.	2019	Schedule C, Line 1, Gross Receipts	\$ 2,300.00
				Schedule C, Line 8, Advertising	\$ 1,000.00
				Schedule C, Line 9, Car and Truck	\$ 3,105.00
				Schedule C, Line 11, Contract Labor	\$ 26,000.00
				Schedule C, Line 25, Utilities	\$ 1,395.00
				Schedule C, Line 27, Other	\$ 1,890.00
15	4/29/2021	G.O.	2020	Schedule C, Line 8, Advertising	\$ 700.00
				Schedule C, Line 9, Car and Truck	\$ 4,330.00
				Schedule C, Line 11, Contract Labor	\$ 15,974.00
				Schedule C, Line 25, Utilities	\$ 1,395.00
16	1/27/2020	P.T.	2019	Schedule C, Line 8, Advertising	\$ 750.00
				Schedule C, Line 9, Car and Truck	\$ 5,469.00
				Schedule C, Line 11, Contract Labor	\$ 13,855.00
				Schedule C, Line 25, Utilities	\$ 1,480.00
17	2/2/2019	M.L.	2018	Schedule C, Line 1, Gross Receipts	\$ 7,320.00
				Schedule C, Line 11, Contract Labor	\$ 35,032.00
18	1/28/2020	M.L.	2019	Schedule C, Line 8, Advertising	\$ 1,395.00
				Schedule C, Line 9, Car and Truck	\$ 5,469.00
				Schedule C, Line 11, Contract Labor	\$ 28,154.00
				Schedule C, Line 25, Utilities	\$ 1,525.00
19	3/2/2021	M.L.	2020	Schedule C, Line 8, Advertising	\$ 1,500.00
				Schedule C, Line 9, Car and Truck	\$ 5,422.00
				Schedule C, Line 11, Contract Labor	\$ 18,792.00
				Schedule C, Line 25, Utilities	\$ 1,525.00

All in violation of Title 26, United States Code, Section 7206(2).

COUNTS 20 – 40

(Aiding and Assisting the Filing of False Tax Returns, 26 U.S.C. § 7206(2))

The Grand Jury further charges:

23. The factual allegation of Paragraphs 1 – 9 and 11 – 18 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.
24. On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant EDWARD G. ROBINSON did willfully aid and assist in, and procure, counsel, and advise in, the preparation and presentation to the Internal Revenue Service of a false Individual Income Tax Return, Form 1040 (including a Form 1040SR) with a

false Schedule C, for the calendar years set forth below, which were false and fraudulent as to a material matter, to wit: the total taxable income reported on the Form 1040 and the following false items, each filing of a return constituting a separate count of this Indictment. The tax returns reported various contract labor, vehicle, advertising, utilities, and other business expenses, whereas, as ROBINSON knew, the taxpayers either did not incur these expenses or incurred the expenses in an amount far less than what was reported on the return, and each sought a refund to which the taxpayer was not entitled:

Count	Approx. Filing Date	Client	Tax Year	False Item(s)	Amount Reported
20	2/2/2019	J.A.	2018	Schedule C, Line 1, Gross Receipts	\$9,130.00
				Schedule C, Line 11, Contract Labor	\$48,209.00
21	1/30/2020	J.A.	2019	Schedule C, Line 1, Gross Receipts	\$3,500.00
				Schedule C, Line 8, Advertising	\$750.00
				Schedule C, Line 9, Car and Truck	\$5,406.00
				Schedule C, Line 11, Contract Labor	\$45,115.00
				Schedule C, Line 25, Utilities	\$975.00
22	2/13/2021	J.A.	2020	Schedule C, Line 1, Gross Receipts	\$0.00
				Schedule C, Line 9, Car and Truck	\$5,359.00
				Schedule C, Line 11, Contract Labor	\$17,836.00
23	3/13/2019	J.B.	2018	Schedule C, Line 9, Car and Truck	\$4,072.00
				Schedule C, Line 11, Contract Labor	\$8,645.00
				Schedule C, Line 22, Supplies	\$735.00
				Schedule C, Line 25, Utilities	\$975.00
				Schedule C, Line 27, Other	\$423.00
24	2/17/2021	J.B.	2020	Schedule C, Line 9, Car and Truck	\$5,422.00
				Schedule C, Line 25, Utilities	\$1,100.00
25	2/8/2019	D.C.	2018	Schedule C, Line 1, Gross Receipts	\$5,700.00
				Schedule C, Line 11, Contract Labor	\$31,511.00
26	2/3/2020	D.C.	2019	Schedule C, Line 1, Gross Receipts	\$4,840.00
				Schedule C, Line 11, Contract Labor	\$27,285.00
				Schedule C, Line 22, Supplies	\$975.00
				Schedule C, Line 25, Utilities	\$1,350.00
27	3/13/2021	D.C.	2020	Schedule C, Line 11, Contract Labor	\$16,547.00

Count	Approx. Filing Date	Client	Tax Year	False Item(s)	Amount Reported
28	4/6/2019	S.D.	2018	Schedule C, Line 1, Gross Receipts	\$975.00
				Schedule C, Line 9, Car and Truck	\$2,796.00
				Schedule C, Line 11, Contract Labor	\$9,720.00
				Schedule C, Line 22, Supplies	\$2,340.00
				Schedule C, Line 25, Utilities	\$1,464.00
29	3/19/2020	S.D.	2019	Schedule C, Line 1, Gross Receipts	\$860.00
				Schedule C, Line 9, Car and Truck	\$570.00
				Schedule C, Line 11, Contract Labor	\$11,210.00
				Schedule C, Line 25, Utilities	\$765.00
30	5/17/2021	S.D.	2020	Schedule C, Line 9, Car and Truck	\$3,927.00
				Schedule C, Line 25, Utilities	\$765.00
31	9/9/2019	A.D.	2018	Schedule C, Line 9, Car and Truck	\$8,280.00
				Schedule C, Line 11, Contract Labor	\$19,374.00
				Schedule C, Line 22, Supplies	\$1,945.00
				Schedule C, Line 25, Utilities	\$1,420.00
32	4/18/2020	A.D.	2019	Schedule C, Line 11, Contract Labor	\$26,000.00
33	4/29/2021	A.D.	2020	Schedule C, Line 9, Car and Truck	\$7,211.00
				Schedule C, Line 11, Contract Labor	\$14,345.00
				Schedule C, Line 13, Depreciation	\$1,950.00
				Schedule C, Line 22, Supplies	\$1,100.00
				Schedule C, Line 25, Utilities	\$920.00
34	1/31/2019	R.J. and B.P.	2018	Schedule C, Line 1, Gross Receipts	\$4,330.00
				Schedule C, Line 9, Car and Truck	\$3,256.00
				Schedule C, Line 11, Contract Labor	\$32,600.00
35	2/16/2021	R.J. and B.P.	2020	Schedule C, Line 1, Gross Receipts	\$ 1,320.00
				Schedule C, Line 9, Car and Truck	\$ 5,417.00
				Schedule C, Line 11, Contract Labor	\$ 7,580.00
				Schedule C, Line 25, Utilities	\$ 1,100.00
36	2/18/2019	M.Ga.	2018	Schedule C, Line 1, Gross Receipts	\$ 3,580.00
				Schedule C, Line 11, Contract Labor	\$ 34,954.00
				Schedule C, Line 25, Utilities	\$ 1,795.00
37	4/30/2022	M.Ga.	2021	Schedule C, Line 9, Car and Truck	\$ 4,536.00
38	1/31/2019	R.H.	2018	Schedule C, Line 1, Gross Receipts	\$ 3,740.00
				Schedule C, Line 9, Car and Truck	\$ 4,201.00
				Schedule C, Line 11, Contract Labor	\$ 14,290.00
				Schedule C, Line 25, Utilities	\$ 2,532.00
39	2/8/2019	P.T.	2018	Schedule C, Line 11, Contract Labor	\$ 5,540.00
40	2/22/2021	P.T.	2020	Schedule C, Line 9, Car and Truck	\$ 5,362.00
				Schedule C, Line 11, Contract Labor	\$ 13,445.00
				Schedule C, Line 25, Utilities	\$ 1,352.00

All in violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.